

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JUSTIN SAMUELS,

Plaintiff,

- against -

BARNARD COLLEGE,

Defendant.

[illegible]

Docket No. 1:23-CV-06181 (PAE) (SLC)

PLAINTIFF'S RULE 26(A) INITIAL DISCLOSURES

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PLEASE TAKE NOTICE that Plaintiff JUSTIN SAMUELS, pursuant to **Federal Rule of Civil Procedure 26(a)(1)**, provides the following initial disclosures based on information reasonably available at this time.

I. Rule 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information

The following individuals may have discoverable information that Plaintiff may use to support his claims, unless solely for impeachment:

- **Justin Samuels (Plaintiff):**
 - Plaintiff has knowledge of the events, communications, and policies related to his claims, including the alleged discrimination and retaliation by Defendant.
- **Representatives of FilmFreeway** (Names and Contact Information TBD):
 - FilmFreeway maintains records of past festival deadlines, submission requirements, and communications related to the Athena Film Festival, which may be relevant to Plaintiff's claims.

Plaintiff reserves the right to supplement or amend this list as discovery progresses.

II. Rule 26(a)(1)(A)(ii): Documents, Data Compilations, and Tangible Things

Plaintiff may rely on the following documents and materials to support his claims:

- **Communications and submissions related to the Athena Film Festival** via FilmFreeway.
- **Email correspondences** with Barnard College or festival organizers regarding submission policies, eligibility, and waiver requests.
- **Copies of festival guidelines and eligibility criteria** to demonstrate alleged discriminatory policies.
- **Documents and communications with the U.S. Department of Education Office for Civil Rights** related to Plaintiff's complaints.
- **Documents and communications with the New York State Division of Human Rights** regarding Plaintiff's complaints.

Plaintiff reserves the right to supplement this list as additional materials become available.

III. Rule 26(a)(1)(A)(iii): Computation of Damages

Plaintiff seeks damages in the following categories, subject to further calculation and expert analysis:

1. **Economic Damages:**
 - Costs associated with film submission fees, lost opportunities, and related expenses.
2. **Emotional Distress Damages:**
 - Compensation for emotional harm resulting from the alleged discrimination and retaliation.
3. **Punitive and Statutory Damages:**

- As permitted by **Title IX, the New York State Human Rights Law, and the New York City Human Rights Law.**

A more detailed computation will be provided after discovery.

IV. Rule 26(a)(1)(A)(iv): Insurance Agreements

Not applicable to Plaintiff.

Dated: February 27, 2025
Respectfully Submitted,



Justin Samuels
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TO:

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